

- 5 -

Forest. By contrast, Kankakee, Illinois (1990 Census population 27,575), will continue to have the following full-time commercial broadcast stations licensed to it: Standard Broadcast Station WKAN, 1320 kHz; FM Broadcast Station WLRT, 92.7 MHz; and FM Broadcast Station WVLI, 95.1 MHz. Thus, it goes without saying that fairness among communities would be served by reallocating Channel 260B from Kankakee to Park Forest and allowing Park Forest, with a population almost the same as that of Kankakee, to have its first broadcast station⁴.

7. The Commission has recently reallocated FM stations from one city to another pursuant to Section 1.420(i) of its Rules. See e.g. *FM Table of Allotments, Slidell and Kenner, Louisiana*, DA 97-1974, released September 19, 1997, 1997 WESTLAW 578005; *FM Table of Allotments, Farmington, Grass Valley, Jackson, Linden, Placerville and Fair Oaks, California*, and *Carson City and Sun Valley, Nevada*, 11 FCC Rcd 8117 (1996); *FM Table of Allotments, Willows and Dunnigan, California*, 10 FCC Rcd 11522 (1995); *FM Table of Allotments, Cadiz and Oak Grove*,

statistical areas. This urbanized area continues into northwestern Indiana (Lake County, Indiana).

⁴Kankakee will continue to receive city-grade service from WRZA.

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Kentucky, 10 FCC Rcd 10785 (1995), *recons. den.*, 11 FCC Rcd 22208 (1996); see also *Television Table of Allotments, Johnstown and Jeannette, Pennsylvania*, 12 FCC Rcd 10300 (1997).

8. In particular, the *Slidell/Kenner* and *Johnstown/Jeannette* cases are on point with the instant case. In *Slidell/Kenner*, the Commission granted station WLTS-FM a reallocation of its Channel 287C1 from Slidell, a community which would continue to have one commercial broadcast station after the reallocation, to Kenner, a community "partially within" the New Orleans Urbanized Area but without its own aural broadcast station. WLTS-FM did not propose a change in transmitter site, and therefore it would continue to provide Slidell with 70 dBu service, despite its relicensing to Kenner. In *Johnstown/Jeannette*, the Commission reallocated television channel 19 from a community in the Johnstown-Altoona television market [DMA] to a community in the Pittsburgh DMA, despite the fact that Johnstown's population was almost three times that of Jeannette (28,134 to 11,221), where the petitioner (station WTWB-TV) would continue to use its existing transmitter site.

- 7 -

9. Conclusion. Park Forest, Illinois has no aural broadcast station at present, and the allocation of Channel 260B there would provide the community with a first local broadcast outlet, which is a primary objective of 47 U.S.C. §307(b). Based on the precedents in *Slidell/Kenner* and *Johnstown/Jeanette* discussed above, as well as the public interest, convenience and necessity, WRZA is entitled as a matter of fact and of law to a grant of this Petition for Rulemaking.

WHEREFORE, Gene Milner Broadcasting Company, Inc. urges that the Commission reallocate FM Channel 260B to Park Forest, Illinois.

Respectfully submitted,

GENE MILNER BROADCASTING COMPANY,
INC.

By 

Dennis J. Kelly
(D. C. Bar #292631)
Its Attorney

LAW OFFICE OF DENNIS J. KELLY
Post Office Box 6648
Annapolis, MD 21401
Telephone: 888-322-5291

November 13, 1997

ENGINEERING EXHIBIT

**PROPOSED RULE MAKING TO
ALLOCATE CHANNEL 260B TO
PARK FOREST, ILLINOIS**

FCC FILE NO. BLR-900117KA

**MILNER BROADCASTING, INC.
dba RADIO STATION WRZA-FM
CH. 260B, 99.9 MHz, 50 kW-ERP
KANKAKEE, ILLINOIS**

OCTOBER 1997

OSCAR LEON CUELLAR, P.E.

CONSULTING ENGINEER ♦ 1559 SO LEWISTON ST AURORA, CO 80017-5109 ♦ (303) 671-2740 ♦ FAX (303) 671-2744

**PROPOSED RULE MAKING TO
ALLOCATE CHANNEL 260B TO
PARK FOREST, ILLINOIS**

Milner Broadcasting, Inc., is the licensee (BLH-900117KA) of commercial FM radio station WRZA on 99.9 MHz, Ch. 260B, operating with 50 kW of ERP at an antenna radiation center height of 150 meters above average terrain at Kankakee, Illinois.

In order to provide local broadcast service to a community with no local station, Milner Broadcasting, Inc., hereinafter referred to as "Milner", is proposing to change it's City of License to Park Forest, Illinois. Accordingly, it is proposed that Ch. 260B be deleted from it's designation at Kankakee and reassigned to Park Forest.

To achieve the proposed operation, it is proposed that the FM Table of Allotments of FCC Section 73.202 be amended as follows:

<u>COMMUNITY</u>	<u>PRESENT CHANNEL ASSIGNMENT</u>	<u>PROPOSED CHANNEL ASSIGNMENT</u>
Kankakee, IL	224A, 236A, 260B	224A, 236A
Park Forest, IL	---	260B

No other changes are proposed!

Park Forest has no local broadcast outlet, FM or AM. Milner proposes to bring the first local FM broadcast outlet to Park Forest, IL, a community with a population of 24,656(1990 Census).

Exhibit No. E-1 is a U.S.G.S. Topographic map, scale 1:250,000, showing WRZA's present antenna site and a segment of it's 3.16 mV/m(70 dBu) contour amply encompassing Park Forest, such that this proposal would comply fully with FCC Section 73.315.

Due to the great differences in the scales between that of Exhibit E-1 and those of the maps depicting the Kankakee and Park Forest city limits, it was nearly impossible to accurately transpose the minute detail of each city's limits onto Exhibit No. E-1. Instead, and to avoid any ambiguity, identifiable landmarks on the city maps, which completely encompassed their respective city boundaries, were carefully selected to form rectangular patterns. Then, for the purposes of clarity, these rectangular patterns were transposed onto Exhibit No. E-1.

Kankakee is presently covered by the 3.16 mV/m contours of WVLI-FM, WLRT-FM, and WRZA-FM. It is also covered by the 5 mV/m contour of WKAN-AM at 1320 kHz, 1 kW-D, 0.5 kW-N, DA-N. These stations are all presently licensed to Kankakee. Of course, Kankakee would continue to receive local broadcast service from the remaining three local stations.

OSCAR LEON CUELLAR, P.E.

CONSULTING ENGINEER ♦ 1559 SO LEWISTON ST AURORA, CO 80017-5109 ♦ (303) 671-2740 ♦ FAX (303) 671-2744

**PROPOSED RULE MAKING TO
ALLOCATE CHANNEL 260B TO
PARK FOREST, ILLINOIS**

Page Two

**Compliance with FCC Guidelines for
Human Exposure to Radio-Frequency Radiation**

Milner presently complies with the guidelines set forth in OST Bulletin No. 65 (Edition 97-1), dated August 1997. As no technical or structural change is proposed, Milner will continue, of course, to remain in full compliance with the aforementioned OST Bulletin.

Allocation Study

Milner is proposing no change in antenna site or ERP. Therefore, the present allocation conditions will remain the same. For reasons unknown to Milner WRZA became short-spaced with several stations as a consequence of the implementation of the new FCC Rules. This short-spacing is shown on Exhibit No. E-8. Thus, the grant of this Instant Report would in no way affect the present allocation status.

Exhibit No. E-3 is a copy of an official map of Kankakee supplied by Mr. David Schaffer, City Planner, Public Works Department, Kankakee, IL.

Exhibit No. E-4 is a copy of an official map of Park Forest supplied by Miss. Adelle Stone and Miss. Janet Timm, Public Works Department, Park Forest, IL.

Exhibit No's. E-5, E-6, and E-7 show the engineering information regarding distance to contours and heights of antenna radiation centers above average terrain for WRZA, WVLI, and WLRT.

Respectfully submitted,



Oscar Leon Cuellar

October 20, 1997

OSCAR LEON CUELLAR, P.E.

CONSULTING ENGINEER ♦ 1559 SO LEWISTON ST AURORA, CO 80017-5109 ♦ (303) 671-2740 ♦ FAX (303) 671-2744

**PROPOSED RULE MAKING TO
ALLOCATE CHANNEL 260B TO
PARK FOREST, ILLINOIS**

A F F I D A V I T

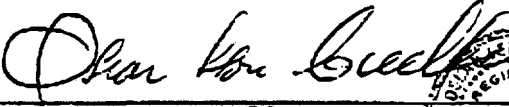
State of Colorado)
City of Aurora) **ss:**
County of Arapahoe)

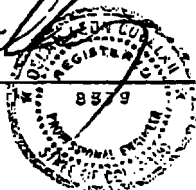
This proposed Rule-Making of Milner Broadcasting, Inc., licensee of commercial radio station WRZA, BLH-900117KA, operating on CH. 260B, 99.9 MHz, with 50 kW-ERP at an antenna radiation center height of 150 meters above average terrain at Kankakee, IL, requesting authorization to change it's City of License to Park Forest, IL, has been prepared by Oscar Leon Cuellar, P.E., Consulting Engineer at Aurora, Colorado.

I am a registered professional engineer in the states of Arizona and Colorado and my engineering qualifications are a matter of record with the Federal Communications Commission since 1963.

All data and statements contained herein are true and correct to the best of my knowledge and belief.


(SEAL)


Oscar Leon Cuellar



Subscribed and sworn to before me this 20th day of October, 1997,
at Aurora, Colorado.

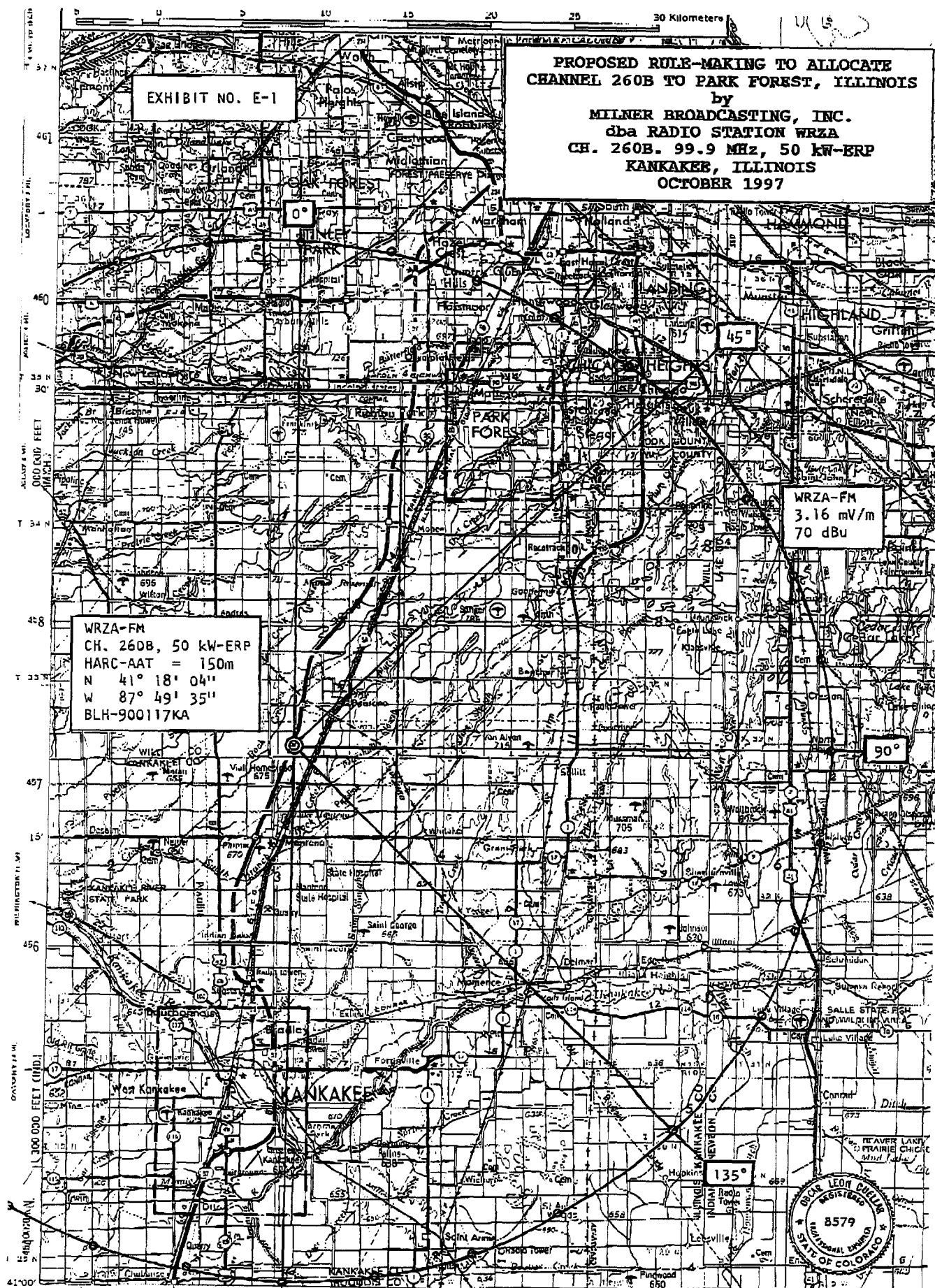
(SEAL)


Notary Public

My Commission expires February 6, 2000.

OSCAR LEON CUELLAR, P.E.

CONSULTING ENGINEER ♦ 1559 SO LEWISTON ST AURORA, CO 80017-5109 ♦ (303) 671-2740 ♦ FAX (303) 671-2744



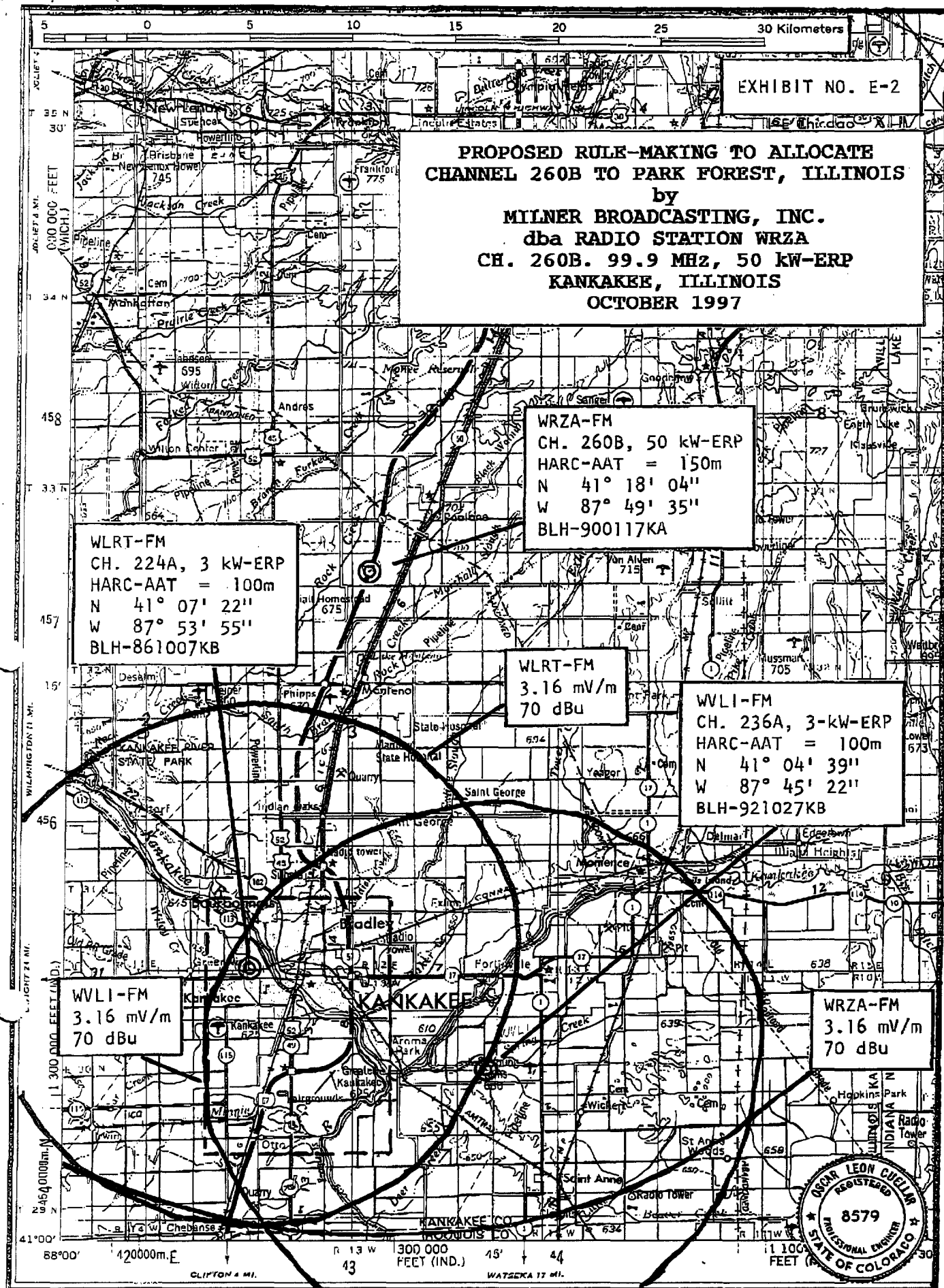
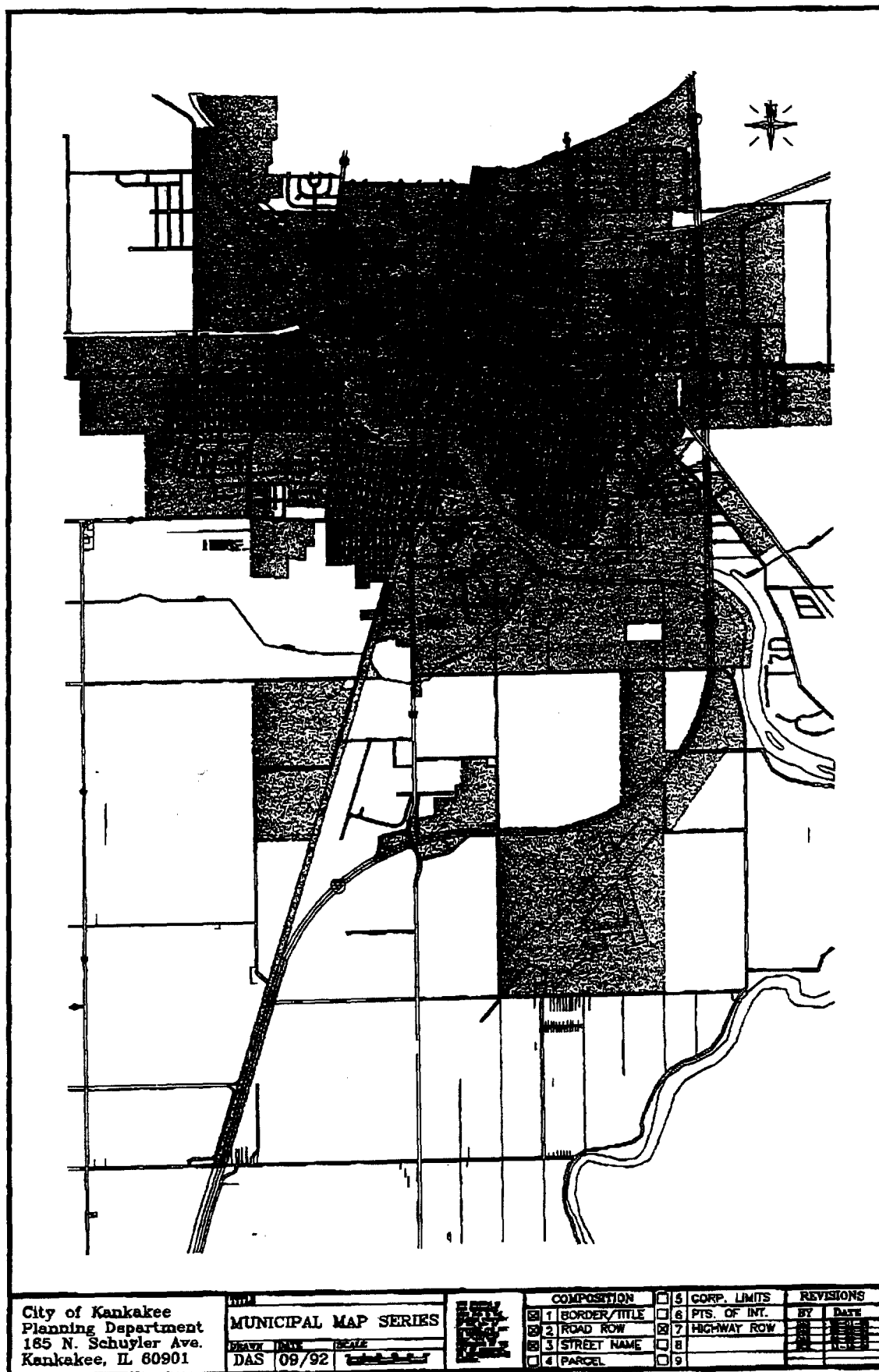
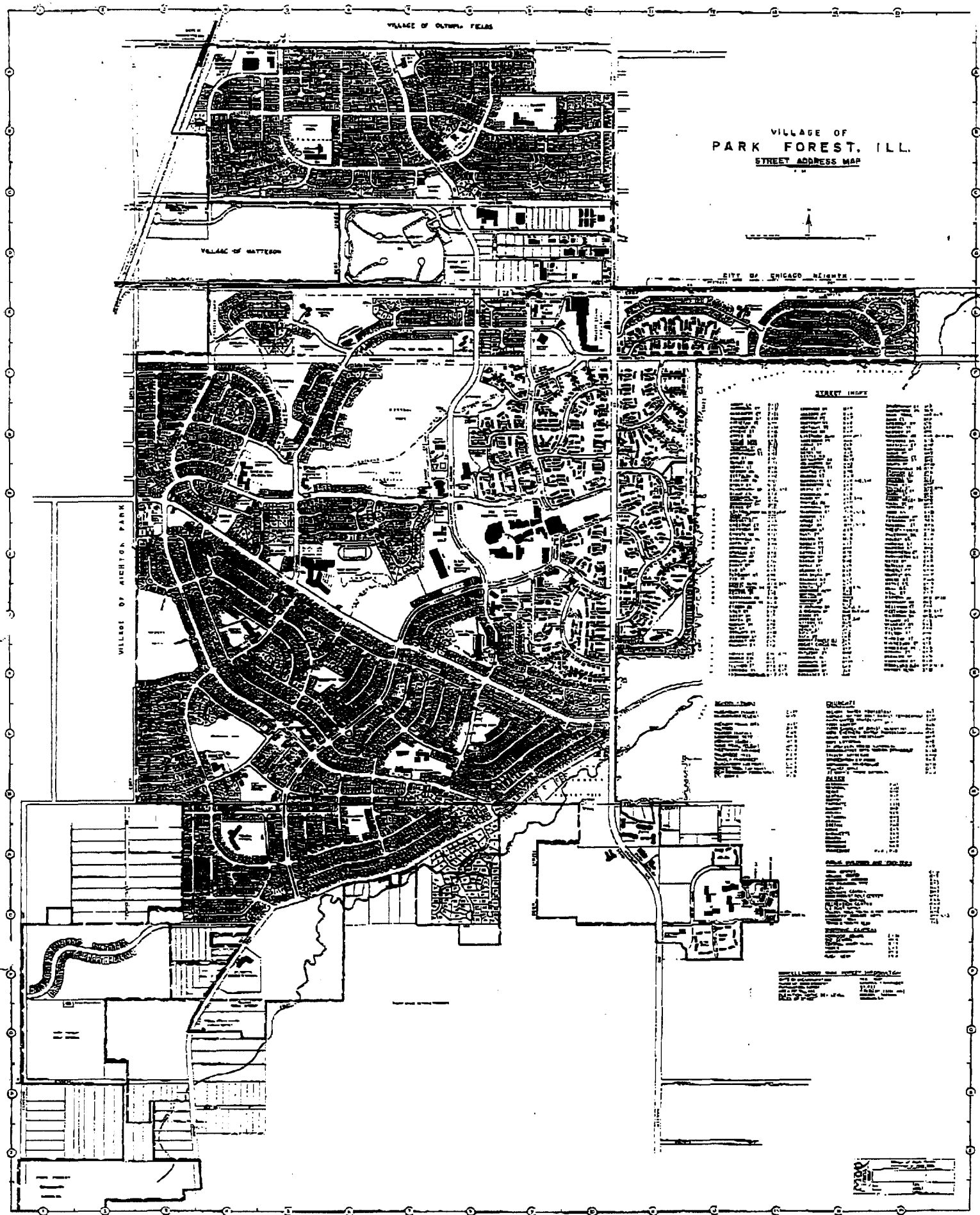


EXHIBIT NO. E-3





Oscar Leon Cuellar P.E.

Project: WRZA Curves: VHF Low Band for 88 MHz to 108 MHz

Source Coordinates: 41-18-04 North 87-49-35 West

This program uses the NGDC 30-Second Database.

Site Elevation AMSL: (680) feet

Antenna HAAT: 150.0 meters

Antenna Center Above Sea Level: 358.0 meters

----- DISTANCES TO CONTOURS IN KILOMETERS -----								
AZM	HAAT	ERP	70 dB	60 dB	100 dB	80 dB	54 dB	40 dB
deg	(m)	(kW)	(km)	(km)	(km)	(km)	(km)	(km)
			50,50	50,50	50,10	50,10	50,10	50,10
0	137	50.00	31.2	50.3	5.7	18.8	76.1	136.0
5	137	50.00	31.2	50.3	5.7	18.8	76.1	136.0
10	136	50.00	31.1	50.2	5.7	18.8	75.9	135.8
15	133	50.00	30.8	49.8	5.6	18.5	75.4	135.4
20	132	50.00	30.7	49.6	5.6	18.4	75.3	135.3
25	131	50.00	30.6	49.5	5.6	18.3	75.1	135.1
30	133	50.00	30.8	49.8	5.6	18.5	75.4	135.4
35	133	50.00	30.8	49.8	5.6	18.5	75.4	135.4
40	134	50.00	30.9	49.9	5.6	18.6	75.6	135.5
45	137	50.00	31.2	50.3	5.7	18.8	76.1	136.0
50	140	50.00	31.5	50.7	5.8	19.1	76.5	136.4
55	137	50.00	31.2	50.3	5.7	18.8	76.1	136.0
60	136	50.00	31.1	50.2	5.7	18.8	75.9	135.8
65	139	50.00	31.4	50.6	5.7	19.0	76.4	136.2
70	142	50.00	31.7	51.0	5.8	19.3	76.8	136.6
75	144	50.00	31.9	51.3	5.8	19.4	77.1	136.9
80	145	50.00	32.0	51.4	5.9	19.5	77.3	137.0
85	147	50.00	32.2	51.7	5.9	19.7	77.6	137.3
90	147	50.00	32.2	51.7	5.9	19.7	77.6	137.3
95	147	50.00	32.2	51.7	5.9	19.7	77.6	137.3
100	148	50.00	32.3	51.8	5.9	19.8	77.8	137.4
105	149	50.00	32.4	51.9	5.9	19.9	77.9	137.5
110	149	50.00	32.4	51.9	5.9	19.9	77.9	137.5
115	151	50.00	32.6	52.2	6.0	20.0	78.2	137.8
120	153	50.00	32.8	52.4	6.0	20.2	78.5	138.1
125	153	50.00	32.8	52.4	6.0	20.2	78.5	138.1
130	154	50.00	32.9	52.5	6.0	20.2	78.6	138.3
135	156	50.00	33.1	52.8	6.1	20.4	78.9	138.5
140	156	50.00	33.1	52.8	6.1	20.4	78.9	138.5
145	157	50.00	33.2	52.9	6.1	20.4	79.1	138.7
150	158	50.00	33.3	53.0	6.1	20.5	79.2	138.8
155	158	50.00	33.3	53.0	6.1	20.5	79.2	138.8
160	158	50.00	33.3	53.0	6.1	20.5	79.2	138.8
165	158	50.00	33.3	53.0	6.1	20.5	79.2	138.8
170	157	50.00	33.2	52.9	6.1	20.4	79.1	138.7
175	158	50.00	33.3	53.0	6.1	20.5	79.2	138.8

**PROPOSED RULE-MAKING TO ALLOCATE
CHANNEL 260B TO PARK FOREST, ILLINOIS**
by
MILNER BROADCASTING, INC.
dba RADIO STATION WRZA
CH. 260B. 99.9 MHz, 50 kW-ERP
KANKAKEE, ILLINOIS
OCTOBER 1997

Oscar Leon Cuellar P.E.

Project: WRZA Curves: VHF Low Band for 88 MHz to 108 MHz

Source Coordinates: 41-18-04 North 87-49-35 West

This program uses the NGDC 30-Second Database.

Site Elevation AMSL: (680) feet

Antenna HAAT: 150.0 meters

Antenna Center Above Sea Level: 358.0 meters

----- DISTANCES TO CONTOURS IN KILOMETERS -----								
AZM	HAAT	ERP	70 dB	60 dB	100 dB	80 dB	54 dB	40 dB
deg	(m)	(kW)	(km)	(km)	(km)	(km)	(km)	(km)
			50,50	50,50	50,10	50,10	50,10	50,10
180	158	50.00	33.3	53.0	6.1	20.5	79.2	138.8
185	156	50.00	33.1	52.8	6.1	20.4	78.9	138.5
190	154	50.00	32.9	52.5	6.0	20.2	78.6	138.3
195	154	50.00	32.9	52.5	6.0	20.2	78.6	138.3
200	156	50.00	33.1	52.8	6.1	20.4	78.9	138.5
205	157	50.00	33.2	52.9	6.1	20.4	79.1	138.7
210	156	50.00	33.1	52.8	6.1	20.4	78.9	138.5
215	156	50.00	33.1	52.8	6.1	20.4	78.9	138.5
220	158	50.00	33.3	53.0	6.1	20.5	79.2	138.8
225	160	50.00	33.5	53.2	6.1	20.6	79.5	139.1
230	161	50.00	33.6	53.3	6.2	20.7	79.6	139.2
235	163	50.00	33.8	53.6	6.2	20.9	79.9	139.5
240	161	50.00	33.6	53.3	6.2	20.7	79.6	139.2
245	160	50.00	33.5	53.2	6.1	20.6	79.5	139.1
250	160	50.00	33.5	53.2	6.1	20.6	79.5	139.1
255	162	50.00	33.7	53.5	6.2	20.8	79.8	139.4
260	162	50.00	33.7	53.5	6.2	20.8	79.8	139.4
265	162	50.00	33.7	53.5	6.2	20.8	79.8	139.4
270	160	50.00	33.5	53.2	6.1	20.6	79.5	139.1
275	159	50.00	33.4	53.1	6.1	20.6	79.4	139.0
280	157	50.00	33.2	52.9	6.1	20.4	79.1	138.7
285	154	50.00	32.9	52.5	6.0	20.2	78.6	138.3
290	153	50.00	32.8	52.4	6.0	20.2	78.5	138.1
295	153	50.00	32.8	52.4	6.0	20.2	78.5	138.1
300	151	50.00	32.6	52.2	6.0	20.0	78.2	137.8
305	150	50.00	32.5	52.1	6.0	19.9	78.0	137.7
310	149	50.00	32.4	51.9	5.9	19.9	77.9	137.5
315	148	50.00	32.3	51.8	5.9	19.8	77.8	137.4
320	147	50.00	32.2	51.7	5.9	19.7	77.6	137.3
325	145	50.00	32.0	51.4	5.9	19.5	77.3	137.0
330	145	50.00	32.0	51.4	5.9	19.5	77.3	137.0
335	145	50.00	32.0	51.4	5.9	19.5	77.3	137.0
340	144	50.00	31.9	51.3	5.8	19.4	77.1	136.9
345	142	50.00	31.7	51.0	5.8	19.3	76.8	136.6
350	140	50.00	31.5	50.7	5.8	19.1	76.5	136.4
355	138	50.00	31.3	50.5	5.7	18.9	76.2	136.1

**PROPOSED RULE-MAKING TO ALLOCATE
CHANNEL 260B TO PARK FOREST, ILLINOIS**

by
MILNER BROADCASTING, INC.
dba RADIO STATION WRZA
CH. 260B. 99.9 MHz, 50 kW-ERP
KANKAKEE, ILLINOIS
OCTOBER 1997

Oscar Leon Cuellar P.E.

Project: WVLI Curves: VHF Low Band for 88 MHz to 108 MHz

Source Coordinates: 41-04-39 North 87-45-22 West

This program uses the NGDC 30-Second Database.

Site Elevation AMSL: (614) feet

Antenna HAAT: 100.0 meters

Antenna Center Above Sea Level: 292.0 meters

----- DISTANCES TO CONTOURS IN KILOMETERS -----								
AZM	HAAT	ERP	70 dB	60 dB	100 dB	80 dB	54 dB	40 dB
deg	(m)	(kW)	(km)	(km)	(km)	(km)	(km)	(km)
			50,50	50,50	50,10	50,10	50,10	50,10

0	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
5	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
10	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
15	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
20	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
25	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
30	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
35	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
40	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
45	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
50	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
55	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
60	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
65	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
70	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
75	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
80	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
85	96	3.000	13.2	23.6	2.2	7.5	35.7	75.1
90	94	3.000	13.1	23.4	2.2	7.4	35.3	74.7
95	94	3.000	13.1	23.4	2.2	7.4	35.3	74.7
100	94	3.000	13.1	23.4	2.2	7.4	35.3	74.7
105	95	3.000	13.2	23.5	2.2	7.4	35.5	74.9
110	96	3.000	13.2	23.6	2.2	7.5	35.7	75.1
115	97	3.000	13.3	23.8	2.2	7.5	35.9	75.3
120	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
125	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
130	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
135	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
140	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
145	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
150	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
155	97	3.000	13.3	23.8	2.2	7.5	35.9	75.3
160	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
165	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
170	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
175	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0

Oscar Leon Cuellar P.E.

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Source Coordinates: 41-04-39 North 87-45-22 West

This program uses the NGDC 30-Second Database.

Site Elevation AMSL: (614) feet

Antenna HAAT: 100.0 meters

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----- DISTANCES TO CONTOURS IN KILOMETERS -----

AZM	HAAT	ERP	70 dB	60 dB	100 dB	80 dB	54 dB	40 dB
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180	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
185	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
190	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
195	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
200	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
205	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
210	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
215	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
220	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
225	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
230	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
235	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
240	97	3.000	13.3	23.8	2.2	7.5	35.9	75.3
245	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
250	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
255	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
260	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
265	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
270	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
275	106	3.000	13.9	24.8	2.3	7.9	37.6	76.9
280	107	3.000	14.0	24.9	2.3	7.9	37.8	77.1
285	108	3.000	14.0	25.0	2.3	7.9	38.0	77.3
290	108	3.000	14.0	25.0	2.3	7.9	38.0	77.3
295	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
300	106	3.000	13.9	24.8	2.3	7.9	37.6	76.9
305	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
310	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
315	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
320	97	3.000	13.3	23.8	2.2	7.5	35.9	75.3
325	96	3.000	13.2	23.6	2.2	7.5	35.7	75.1
330	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
335	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
340	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
345	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
350	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
355	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6

Oscar Leon Cuellar P.E.

Project: WLRT Curves: VHF Low Band for 88 MHz to 108 MHz

Source Coordinates: 41-07-22 North 87-53-35 West

This program uses the NGDC 30-Second Database.

Site Elevation AMSL: (620) feet

Antenna HAAT: 100.0 meters

Antenna Center Above Sea Level: 295.0 meters

----- DISTANCES TO CONTOURS IN KILOMETERS -----								
AZM	HAAT	ERP	70 dB	60 dB	100 dB	80 dB	54 dB	40 dB
deg	(m)	(kW)	(km)	(km)	(km)	(km)	(km)	(km)
			50,50	50,50	50,10	50,10	50,10	50,10
0	96	3.000	13.2	23.6	2.2	7.5	35.7	75.1
5	95	3.000	13.2	23.5	2.2	7.4	35.5	74.9
10	94	3.000	13.1	23.4	2.2	7.4	35.3	74.7
15	93	3.000	13.0	23.3	2.2	7.3	35.1	74.5
20	92	3.000	13.0	23.2	2.2	7.3	34.9	74.3
25	92	3.000	13.0	23.2	2.2	7.3	34.9	74.3
30	92	3.000	13.0	23.2	2.2	7.3	34.9	74.3
35	94	3.000	13.1	23.4	2.2	7.4	35.3	74.7
40	96	3.000	13.2	23.6	2.2	7.5	35.7	75.1
45	97	3.000	13.3	23.8	2.2	7.5	35.9	75.3
50	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
55	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
60	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
65	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
70	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
75	104	3.000	13.8	24.5	2.3	7.8	37.3	76.6
80	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
85	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
90	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
95	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
100	106	3.000	13.9	24.8	2.3	7.9	37.6	76.9
105	107	3.000	14.0	24.9	2.3	7.9	37.8	77.1
110	109	3.000	14.1	25.1	2.3	8.0	38.1	77.5
115	110	3.000	14.2	25.2	2.3	8.0	38.3	77.6
120	109	3.000	14.1	25.1	2.3	8.0	38.1	77.5
125	107	3.000	14.0	24.9	2.3	7.9	37.8	77.1
130	107	3.000	14.0	24.9	2.3	7.9	37.8	77.1
135	106	3.000	13.9	24.8	2.3	7.9	37.6	76.9
140	107	3.000	14.0	24.9	2.3	7.9	37.8	77.1
145	107	3.000	14.0	24.9	2.3	7.9	37.8	77.1
150	108	3.000	14.0	25.0	2.3	7.9	38.0	77.3
155	110	3.000	14.2	25.2	2.3	8.0	38.3	77.6
160	108	3.000	14.0	25.0	2.3	7.9	38.0	77.3
165	104	3.000	13.8	24.5	2.3	7.8	37.3	76.6
170	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
175	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2

Oscar Leon Cuellar P.E.

Project: WLRT Curves: VHF Low Band for 88 MHz to 108 MHz

Source Coordinates: 41-07-22 North 87-53-35 West

This program uses the NGDC 30-Second Database.

Site Elevation AMSL: (620) feet

Antenna HAAT: 100.0 meters

Antenna Center Above Sea Level: 295.0 meters

----- DISTANCES TO CONTOURS IN KILOMETERS -----								
AZM	HAAT	ERP	70 dB	60 dB	100 dB	80 dB	54 dB	40 dB
deg	(m)	(kW)	(km)	(km)	(km)	(km)	(km)	(km)
			50,50	50,50	50,10	50,10	50,10	50,10
180	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
185	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
190	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
195	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
200	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
205	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
210	97	3.000	13.3	23.8	2.2	7.5	35.9	75.3
215	96	3.000	13.2	23.6	2.2	7.5	35.7	75.1
220	97	3.000	13.3	23.8	2.2	7.5	35.9	75.3
225	98	3.000	13.4	23.9	2.2	7.5	36.1	75.4
230	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
235	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
240	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
245	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
250	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
255	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
260	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
265	103	3.000	13.7	24.4	2.3	7.7	37.1	76.4
270	104	3.000	13.8	24.5	2.3	7.8	37.3	76.6
275	104	3.000	13.8	24.5	2.3	7.8	37.3	76.6
280	104	3.000	13.8	24.5	2.3	7.8	37.3	76.6
285	104	3.000	13.8	24.5	2.3	7.8	37.3	76.6
290	104	3.000	13.8	24.5	2.3	7.8	37.3	76.6
295	104	3.000	13.8	24.5	2.3	7.8	37.3	76.6
300	105	3.000	13.8	24.7	2.3	7.8	37.4	76.7
305	107	3.000	14.0	24.9	2.3	7.9	37.8	77.1
310	110	3.000	14.2	25.2	2.3	8.0	38.3	77.6
315	114	3.000	14.4	25.6	2.4	8.1	39.0	78.3
320	113	3.000	14.3	25.5	2.3	8.1	38.8	78.2
325	104	3.000	13.8	24.5	2.3	7.8	37.3	76.6
330	102	3.000	13.6	24.3	2.3	7.7	36.9	76.2
335	101	3.000	13.6	24.2	2.3	7.7	36.7	76.0
340	100	3.000	13.5	24.1	2.3	7.6	36.5	75.8
345	99	3.000	13.4	24.0	2.2	7.6	36.3	75.6
350	97	3.000	13.3	23.8	2.2	7.5	35.9	75.3
355	97	3.000	13.3	23.8	2.2	7.5	35.9	75.3

08-19-1997

Oscar Leon Cuellar P.E.

PAGE 1

Study for: WRZA
 Location: KANKAKEE, IL
 Call City, State
 Status Proponent

FCC Database Date: 7/97
 Channel Class: B
 Chan Class Freq kW Latitude Dist. Required
 File Number HAAT Longitude Azm. Clear (km)

>>>>>>> Study For Channel 260 99.9 MHz <<<<<<<<

WRZA	KANKAKEE, IL	260 B	99.9	50.	41-18-04	0.0	241	
LIC	GENE MILNER BROADCAST	BLH-900117KA	150	87-49-35	0.0	-241.0	SHORT	
WHFBFM	BENTON HARBOR, MI	260 B	99.9	50.	42-03-17	141.3	241	
LIC	WHFB B/C ASSOCIATES L	BLH-900118KB	147	86-27-31	53.2	-99.7	SHORT	
	Use of 73.215 for short spacing requires:	211				-69.7	SHORT	
WTHIFM	TERRE HAUTE, IN	260 B	99.9	50.	39-27-57	206.9	241	
LIC	WABASH VALLEY BROADCAST	BLH-820910AJ	149	87-24-12	169.9	-34.1	SHORT	
	Use of 73.215 for short spacing requires:	211				-4.1	SHORT	
WJVL	JANESVILLE, WI	260 B1	99.9	11.0	42-43-47	193.8	211	
LIC	SOUTHERN WISCONSIN RA	BLH-891018KB	153	89-10-10	325.4	-17.2	SHORT	
	Use of 73.215 for short spacing requires:	178				+15.8	CLEAR	
WSEW	FRANKFORT, IN	259 B	99.7	50.	40-25-14	154.1	169	
LIC	KASPAR BROADCASTING C	BLH-820419AT	140	86-24-47	128.9	-14.9	SHORT	
	Use of 73.215 for short spacing requires:	145				+9.1	CLOSE	
WIXO	BARTONVILLE, IL	260 A	99.9	1.5	40-36-23	163.5	178	73.215
LIC	HOWARD G. BILL	BLH-970303KC	178	89-32-20	242.4	-14.5	SHORT	
	Use of 73.215 for short spacing requires:	143				+20.5	CLEAR	
WUSN	CHICAGO, IL	258 B	99.5	8.3	41-53-56	68.5	74	
LIC	INFINITY BROADCASTING	BLH-891214KB	358	87-37-23	14.3	-5.5	SHORT	
	Use of 73.215 for short spacing requires:	71				-2.5	SHORT	
WPNTFM	CHICAGO, IL	262 B	100.3	8.3	41-53-56	68.5	74	
LIC	CENTURY CHICAGO BROADCAST	BLH-891120KC	358	87-37-23	14.3	-5.5	SHORT	
	Use of 73.215 for short spacing requires:	71				-2.5	SHORT	
WGLC	MENDOTA, IL	261 A	100.1	6.0+	41-32-16	110.2	113	73.215
LIC	MENDOTA BROADCASTING,	BLH-911023KA	100	89-06-25	284.2	-2.8	SHORT	
	Use of 73.215 for short spacing requires:	96				+14.2	CLOSE	
NEW	WINAMAC, IN	261 A	100.1	6.0	41-02-21	113.81	113	
CP	PROGRESSIVE BROADCAST	BPH-930504MB	100	86-30-55	104.4	+0.81	CLOSE	
IFM	KNOX, IN	257 A	99.3	3.3	41-19-20	102.3	69	
LIC	KANKAKEE VALLEY BROADCAST	BMLH-910401KB	91	86-36-17	88.3	+33.3	CLEAR	
	Class B1 with respect to Canada							
WRKC	CHICAGO, IL	207 A	89.3	.250+	41-46-15	54.7	15	
LIC	BOARD OF TRUSTEES OF	BLED-900521KB	35	87-37-48	17.4	+39.7	CLEAR	

DYBEDOCK & ASSOCIATES, INC.

1455 Budd Boulevard - Kankakee, Illinois 60901
(815) 937-1722 - FAX (815) 937-1844

DECLARATION

I, Howard S. Dybedock, hereby state as follows:

I am a consulting broadcast engineer and a principal in the broadcast consulting firm of Dybedock and Associates, Inc. I have over 38 years experience in broadcast engineering. My academic credentials are a matter of record with the Federal Communications Commission.

This Declaration is prepared on behalf of Z-Spanish Media Licensing Company, LLC., in support of Comments regarding a Petition for Rule Making to reallocate Channel 260B from Kankakee to Park Forest, Illinois. Petitioner is licensee of WRZA (FM), a Class-B station operating on Channel 260, and short spaced to several co channel and adjacent channel stations.

As a technical consultant residing in Kankakee, Illinois, a former owner and developer of the station now operating as WRZA and a consultant to several of the stations under consideration in this discussion, I am familiar with the history of the pertinent stations, the approximate dates of their original licensing, and the origin of the short-spacings. The information herein is based on my personal knowledge and review of records of the Federal Communications Commission.

WRZA was originally operated as WKAK-FM, and began operation January 5, 1962. At that time, five of the six grandfathered stations were already on the air. WUSN began operation in 1940 as one of the first station in Chicago, and moved to 99.5 immediately after World War II. Both WHFB-FM, Benton Harbor, Michigan and WJVL, Janesville, Wisconsin began operation on 99.9 in 1947. WNND, Chicago, commenced operation on 100.3, also in 1947. WTHI-FM, Terre Haute, Indiana began broadcasting on 99.9 in 1948. Finally, WSHW, Frankfort, Indiana came on the air on 99.7 in September 1962.

At the time the original seven stations began broadcasting, the allocation scheme was based on interference contours and not spacing, thus technically, no short spacing existed prior to 1964. With the institution of the spacing rules in 1964, WRZA (WKAK-FM) became short spaced to WUSN, WSHW, WHFB-FM, WTHI-FM, WJVL, and WNND and all seven of the aforementioned stations became "Grandfathered" under the rules. Between 1964 and 1989, most of these stations improved their facilities utilizing the "bracket" system that was then in effect. Though short spaced, if a station was within a particular range of miles (or brackets) to other short spaced stations, it could increase its power to the limit permitted by that bracket.

Station WGLC-FM, Mendota, Illinois commenced operation on September 1, 1965 as a fully spaced Class-A operating on 100.1 with 3 kW ERP. With the change of spacing rules in 1989, WGLC became short spaced to WRZA, but subsequently was able to improve its facility to 6 kW with a directional antenna through a filing under 73.215.

WIXO, Class A on 99.9, Bartonville, Illinois, appears to have filed its first application for a construction permit in 1991, but was not initially granted because of competing applications. The CP was finally granted in 1996. The station then appears to have filed an application under 73.215 to specify a location that was short spaced to WRZA but provided contour protections. This was granted and the station was constructed in 1997. It is currently listed in the FCC database as operating under 73.215.

In conclusion, as noted in the December 15, 1999 FCC release, two of the stations are short spaced to WRZA by virtue of 73.215. The remaining stations were all grandfathered by the implementation of the spacing rules of 1964.

The foregoing is true and correct to the best of my knowledge and belief.

Stated this 4th day of February 2000.

A handwritten signature in black ink, appearing to read "Howard S. Dybedock", is written over a horizontal line.

Howard S. Dybedock, President
Dybedock and Associates, Inc.
Consulting Broadcast Engineers

DECLARATION

I, Janet Muchnik, Park Forest Village Manager, hereby state that all of the information regarding the community of Park Forest contained within the attached copy of the Park Forest informational brochure is true and correct to the best of my knowledge and belief.

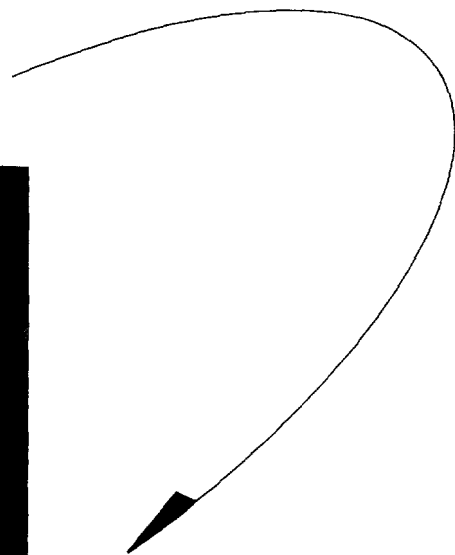
Stated this 7th day of February 2000.



Janet Muchnik
Park Forest Village Manager



P F



COMMISSIONS

Citizen boards, commissions and committees assist the Village of Park Forest's Board of Trustees with finding information, evaluating requests, making recommendations and developing Village policies.

Residents from all walks of Park Forest life serve on these groups. Vacancies occur when members move out of the Village, their circumstances change or their terms expire.

You needn't be a technical expert to be appointed to a board, commission or committee. In fact, these groups can seek technical advice from Village residents or outside experts to assist in their deliberations, subject to statutory requirements.

Current Boards and Commissions in Park Forest are:

- Commission on Human Relations
- Fair Housing Review Board
- Plan Commission
- Recreation and Parks Board
- Equal Employment Opportunity Review Board
- Zoning Board of Appeals
- Cable Communications Commission
- Environment Conservation Commission

If you'd like to get involved in this advisory level of Village government, call the Manager's Office for an application form or more information.

Village of Park Forest



301 Centre
Park Forest, Illinois 60466
708.748.1112